

Jonathan M. Baum (SBN: 303469)
Steptoe LLP
One Market Street
Steuart Tower, Suite 1070
San Francisco, CA 94105
Telephone: (510) 735-4558
jbaum@steptoe.com

Reid H. Weingarten
Brian M. Heberlig
Michelle L. Levin
Nicholas P. Silverman
Drew C. Harris
(Admitted Pro Hac Vice)

Steptoe LLP
1114 Avenue of the Americas
New York, NY 10036
Telephone: (212) 506-3900

Christopher Morvillo
Celeste L. Koeleveld
Daniel S. Silver
(Admitted Pro Hac Vice)
Clifford Chance US LLP
31 West 52nd Street
New York, NY 10019
Telephone: (212) 878-3437
christopher.morvillo@cliffordchance.com

*Attorneys for Defendant
Michael Richard Lynch*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No.: 3:18-cr-00577-CRB

Judge: Hon. Charles Breyer

**DECLARATION OF JONATHAN M.
BAUM IN SUPPORT OF DEFENDANT
MICHAEL RICHARD LYNCH'S MOTION
FOR ADMISSION OF FULL AUDIO
RECORDING**

Date Filed: May 19, 2024

DECLARATION OF JONATHAN M. BAUM

I, Jonathan M. Baum, declare as follows:

1. I am an attorney licensed to practice law in California and a partner at the law firm of Steptoe LLP, counsel for the defendant Michael Richard Lynch. I am admitted to the United States District Court, Northern District of California.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit A is a true and correct copy of Exhibit 8598, the transcript associated with Exhibit 8257.

4. Attached hereto as Exhibit B is a true and correct copy of an excerpt of Exhibit 8598, the transcript associated with Exhibit 8257.2.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed May 19, 2024 in San Francisco, California.

Dated: May 19, 2024

Respectfully submitted,

/s/ Jonathan M. Baum

Jonathan M. Baum